



3. On November 21, 2011, Plaintiffs moved for summary judgment pursuant to Federal Rule of Civil Procedure 56(a). Under Local Rule 7.1(b)(2), Defendants' response to the motion is currently due on December 12, 2011.

4. Defendants, however, need more time than the current deadlines of December 30, 2011 and December 12, 2011, respectively, to respond to the Complaint and Plaintiffs' motion for summary judgment. Because the Complaint asserts constitutional claims against three separate federal agencies, the Departments of Justice, Defense and Veterans Affairs, coordination among these agencies is required, and thus, more time is needed for the government to prepare its response.

5. In addition, in the interest of judicial economy, Defendants believe that synchronizing the deadlines for their responses to the Complaint and Plaintiffs' motion for summary judgment will help streamline the case.

6. Accordingly, Defendants respectfully request that the deadlines for their answer or other response to the Complaint and for their response to Plaintiffs' motion for summary judgment be synchronized and that the deadlines for both be extended to February 28, 2012, sixty (60) days from the current answer date of December 30, 2011.

WHEREFORE, Defendants respectfully request that they be given until February 28, 2012 to answer or otherwise respond to the Complaint and to respond to Plaintiffs' motion for summary judgment.

Dated: December 5, 2011

Respectfully Submitted,

TONY WEST  
Assistant Attorney General

CARMEN M. ORTIZ  
United States Attorney

ARTHUR GOLDBERG  
Assistant Branch Director

*/s/ Jean Lin*

---

JEAN LIN  
Senior Trial Counsel  
U.S. Department of Justice  
Civil Division  
Federal Programs Branch  
20 Massachusetts Avenue, NW  
Washington, DC 20530  
Phone: (202) 514-3716  
Fax: (202) 616-8470  
email: [jean.lin@usdoj.gov](mailto:jean.lin@usdoj.gov)

**Local Rule 7.1 Certificate**

Pursuant to Local Rule 7.1(a)(2), undersigned counsel has conferred with counsel for Plaintiffs, Mr. Christopher Man, regarding this motion. Mr. Man indicated that Plaintiffs consent to Defendants' extension request.

*/s/ Jean Lin*

---

JEAN LIN

**CERTIFICATE OF SERVICE**

I certify that on December 5, 2011, I filed the foregoing Consent Motion for Extension of Time using the CM/ECF system, that a copy will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that the attorneys for all parties in this case as listed below are registered CM/ECF participants:

Ian McClatchey, Esq.  
IMcClatchey@Chadbourn.com  
CHADBOURNE & PARKE LLP  
30 Rockefeller Plaza  
New York, NY 10112

Abbe David Lowell, Esq.  
ADLowell@Chadbourn.com  
Christopher D. Man  
CMan@Chadbourn.com  
CHADBOURNE & PARKE LLP  
1200 New Hampshire Ave., NW  
Washington, DC 20036

John M. Goodman, Esq.  
JGoodman@SLDN.org  
David McKean  
DMcKean@SLDN.org  
SERVICEMEMBERS LEGAL DEFENSE NETWORK  
Post Office Box 65301  
Washington, DC 20035

*/s/ Jean Lin*

---

JEAN LIN